

LOCAL BANKRUPTCY FORM 9013-3

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE:

William M Winfield

Debtor(s)

William M. Winfield

Plaintiff(s)/Movant(s)

vs.

Toyota Motor Credit
Trustee Charles DeHart as Trustee,
WELLS FARGO BANK N.A.

Defendant(s)/Respondent(s)

CHAPTER 13

CASE NO. 5 - 18 -bk- 3284

ADVERSARY NO. X - X ap- XXXXXXXX
(if applicable)

Nature of Proceeding: Conf/Obj's

hearing

Document #:

REQUEST TO CONTINUE HEARING/TRIAL WITH CONCURRENCE¹

This request must be filed at least twenty-four (24) hours prior to the hearing. All requests must be approved by the Court. Submitting a request is not an automatic continuance.

The undersigned hereby requests a continuance with the concurrence of the opposing party (parties). This is a first request for a continuance.²

Reason for the continuance.

Counsel have been in contact, identified issues with the plan and proofs of claims and are working toward a resolution of the disputes and anticipate an amended plan being filed.

Contemporaneous with the filing of this request, the undersigned has served a copy of this request upon all counsel participating in this proceeding.

Dated: 11/05/2018

s/Mark E. Moulton

Attorney for William M. Winfield

Name: Mark E. Moulton

Phone Number: 570-775-9525

¹ No alterations or interlineations of this document are permitted.